

TUVQPAÖÜCEVÖÖ
Kevin H. Sharp

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

JEFFREY J. ZANDER, individually and)
as Trustee of the CARDINAL TRUST)
under Agreement dated February 11,)
2009, and JJZ INSURANCE AGENCY,)
a Tennessee general partnership d/b/a)
ZANDER INSURANCE GROUP,)

No. 3:12-cv-00967

Plaintiffs,)

v.)

KATZ, SAPPER & MILLER, LLP;)
KSM BUSINESS SERVICES, INC., and)
ANDREW J. MANCHIR,)

Defendants.)

PLAINTIFFS' MOTION FOR LEAVE TO FILE RESPONSE IN EXCESS OF 25 PAGES

Plaintiffs request leave to file a single memorandum, 35 pages in length, in response to three separate and interlocking post-trial Motions filed by Defendants. In support of this Motion, Plaintiffs state as follows:

1. On August 12, 2014, Defendants filed three separate post-trial motions, supported by three separate memoranda of law. Two of those Memoranda were 25 pages (see Dkts. 250-1 and 251-1), while the third (Dkt. 249-1) provided an additional 13 pages of legal argument for a total of 63 pages.

2. As is shown in the Response to Defendants' Post-Trial Motions (Dkt. 264), Defendants' Motions overlap and are best and most efficiently analyzed as a single Motion seeking alternative relief under Rules 50 and 59. Such an omnibus response will save time and enhance the ease of analyzing the post-trial motions.